

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Navient Corporation, *et al.*,

Defendants.

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Civil Action No. 3:CV-17-00101
(Hon. Robert D. Mariani)

DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure Rule 56, Defendants Navient Solutions, LLC (“Navient”), Navient Corporation, and Pioneer Credit Recovery, Inc. (“Pioneer”) (together, “Defendants”), by and through undersigned counsel, hereby move for summary judgment in favor of Defendants on Counts I through XI of the Complaint. *See* Compl. ¶¶ 138–97. In support of this motion, Defendants submit the attached Memorandum of Law, Statement of Undisputed Material Facts, and accompanying exhibits.

Defendants respectfully submit that the CFPB has insufficient evidence to establish the existence of essential elements for each of its claims on which it bears the burden of proof. Because the CFPB has failed to meet its burden on each count, summary judgment should be granted in favor of Defendants.

Dated: May 19, 2020

Respectfully submitted,

/s/ Jonathan E. Paikin

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Solutions, LLC, and Pioneer Credit Recovery,
Inc.*

CERTIFICATE OF NON-CONCURRENCE

I hereby certify that I sought concurrence from Plaintiff's counsel, Nicholas K. Jabbour, in relation to this Motion. Plaintiff's counsel has not concurred in this motion.

/s/ Karin Dryhurst

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2020, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Karin Dryhurst
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